

Law Offices of

Joseph A. Altman, P.C.

654 North Terrace Avenue
Fleetwood, New York 10552

Phone: (718) DA8-0422

Fax: (718) 378-4898

E-mail: AltmanEsq@aol.com

Service of papers will not be accepted via fax and/or e-mail.

FREDERICK P. ALTMAN (1928-1997)

JOSEPH A. ALTMAN*

*MEMBER NEW YORK, NEW JERSEY & FLORIDA BAR

January 19, 2024

Honorable Dale E. Ho, UUDJ
United States District Court
Southern District of New York
40 Foley Square, Courtroom 905
New York, New York 10007

RE: Quhshi v. Hartford Underwriters Insurance Company
Case No.: 1:34-cv-7935-DEH

Dear Judge Ho:

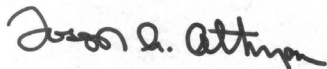
As the attorney for the Plaintiff, we hereby respond to the January 11, 2024 letter from the Defendant's attorney. First, I apologize to the Court and to opposing counsel for my untimely Reply, and overlooking the emails/notification, wherein due to the illness of my staff, my ability to respond has been hampered.

As to the Defendant's Demands and the Plaintiff's Responses, I have been in contact with my client, to finalize the responses, requested by the Defendant, wherein the Plaintiff has provided his proof of loss, via the relevant invoices. I would add that the Plaintiff has certain limitations in responding, and he sought the aid of an assistant to comply. Hence, I am confident that we can provide the Responses to the Defendant's Discovery Demands and Notices within the next 40 days, and respectfully request a 40 Day Extension to respond to all of the Defendant's Notices and Demands, with Depositions to be held within 30 days thereafter. Thank you.

Respectfully submitted,

Very truly yours,

Joseph A. Altman P.C.



BY: Joseph A. Altman, Esq.

Cc: MENZ BONNER KOMAR & KOENIGSBERG LLP
800 Westchester Avenue, Suite 641-N
Rye Brook, New York 10573
Tel.: (914) 949-0222
(mkomar@mbkklaw.com)
(mdriscoll@mbkklaw.com)